

Remarks/Arguments

The Office Action mailed September 30, 2008 has been reviewed and carefully considered.

Claims 1-17 are now pending in this application. Claim 1 has been amended. Support for the amendment may be found in the present specification at least at page 11, lines 4-10, page 61, lines 11-16, page 64, lines 10-14, and page 67, lines 1-6. No new matter has been added. Reconsideration of the above-identified application, as herein amended and in view of the following remarks, is respectfully requested.

Claims 1, 2, 8, 10, 15, and 16 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Application No. US 20060019666 A1 by Tell et. al.

Claim 1 now recites, *inter alia*, “an audio gateway, connected to said SLIC, for wirelessly receiving the audio from a cellular phone connected to the cellular phone network for subsequent transmission to the at least one residential POTS phone and for wirelessly transmitting the audio from the POTS line to the cellular phone, *the audio gateway configured to employ a profile to provide cellular phone features to the at least one residential POTS phone.*”

Tell discloses a method and gateway for controlling call routing. In asserting the rejection, the Examiner cites Figure 1 as being a combined POTS and cellular interface that can switch from one network to the other or use both simultaneously. Figure 1 clearly shows the infrastructure-centric implementation of call routing between POTS and cellular networks as taught by Tell. A soft switch, resident within the service providers WAN, performs call routing between the POTS and cellular networks (paragraph 0021). A residential gateway bridges various user devices to the POTS and cellular networks with *only attachment functionality*, and in some embodiments, the residential gateway has a shared role in call routing (paragraphs 0022, 0032). Tell, however, is completely silent at least with respect to making cellular call features or any other features available for use with the residential POTS phone, and does not remotely

suggest at least “*the audio gateway configured to employ a profile to provide cellular phone features to the at least one residential POTS phone,*” as is now recited in Claim 1.

In contrast, the present invention provides a device-centric system for integrating POTS and cellular networks, which offers substantially more comprehensive interoperability between cellular and POTS networks, without requiring a network service provider presence to do so. The present specification articulates this on page 11, lines 4-10:

Also, the present invention advantageously provides the capability for existing home Corded/Cordless phones to make/receive calls, receive Caller ID information of a cell/PCS call, have three party conversation, call Hold, Call duration indication and many other features offered by cell/PCS handset through the TAP.

Additionally, the present invention advantageously provides the capability to distribute data from the cell/PCS network, in the form of Instant Message (IM), MM, and email to any of the residential phones/terminals.

Hence, the present invention provides far more than a bridge with call routing between POTS and cellular technologies. The present invention seeks, among other things, to ensure the feature richness of cellular technologies, to the fullest extent possible, is also made available to the residential POTS phones or terminals. To this end, the present invention provides for an extensive feature inventory dialog to take place between the audio gateway and the cellular phone at initialization (present specification page 64, lines 9-19, Figure 35).

Tell seeks only simple registration between a wireless communications unit and the residential gateway and describes this at paragraph 0026 (emphasis added):

When a wireless communications unit 113 moves to a location in or near a residence having a residential gateway 200, the control processor or controller 209 directs the wireless LAN transceiver, 802.XX AP 217, which is coupled to and cooperatively operable with the control processor 209, to *form an association with the wireless communications unit*. In certain embodiments, the wireless communications unit recognizes the residential gateway (RG) 200 by receiving a beacon from the wireless LAN transceiver 802.XX AP 217 and thereafter the communication unit and residential gateway *form the association in a known manner*. The WAN transceiver 229 is operable on the wireless WANs 124, 131, in certain embodiments a packet data WAN, a 3G WAN, a UMTS WAN, or other broadband WAN.

Hence, Tell discusses forming a basic association between a wireless device and the residential gateway and then proceeds to discuss the connectivity between the residential gateway and the wide area network. Moreover, the totality of the Tell disclosure is silent with respect to any cellular phone feature acquisition and distribution to the residential POTS environment.

Thus, Tell does not remotely teach or suggest at least, “an audio gateway, connected to said SLIC, for wirelessly receiving the audio from a cellular phone connected to the cellular phone network for subsequent transmission to the at least one residential POTS phone and for wirelessly transmitting the audio from the POTS line to the cellular phone, *the audio gateway configured to employ a profile to provide cellular phone features to the at least one residential POTS phone,*” as recited in Claim 1.

Accordingly, Claim 1 is believed to be in condition for allowance over Tell for at least the stated reasons. Dependent Claims 2-17 include further distinctions over Tell, and are believed to be patentable at least due to their dependency from Claim 1. Thus, early and favorable reconsideration is respectfully requested.

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Claims 3-7, 11-14, and 17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tell et al. Claims 3-7, 11-14, and 17 depend from Claim 1. As such, these claims include additional distinctions over Tell and are patentable for at least the reasons cited above with respect to the U.S. Patent Application of Tell.

In view of the foregoing, Applicant respectfully requests that the rejections of the claims set forth in the Office Action of September 30, 2008 be withdrawn, that pending Claims 1-17 be allowed, and that the case proceed to early issuance of Letters Patent in due course.

It is believed that no additional fees or charges are currently due. However, in the event that any additional fees or charges are required at this time in connection with the application, they may be charged to applicant's representatives Deposit Account 07-0832.

Respectfully submitted,
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